

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,  
JOHN DOE 1 (the Captain),  
J. DOE 2 (the Flight Attendant),  
DELILAH DOE (the Ticket Agent), and  
NICOLE DOE (the Ticket Counter  
Supervisor),

Defendants.

Civil Action No: 05-11652-WGY

**PLAINTIFF'S MOTION FOR  
ADMISSION OF ATTORNEY *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, the undersigned, a member in good standing of this Court, respectfully prays for the admission *pro hac vice* of Attorney Michael T. Kirkpatrick of the Public Citizen Litigation Group, to act as counsel for Plaintiff John D. Cerqueira. Attorney Kirkpatrick has executed a Certificate in accordance with Local

Rule 83.5.3, which is submitted herewith. The necessary fee will be submitted under separate cover.

Respectfully submitted,

**JOHN D. CERQUEIRA**

By his attorneys,

/s/ David S. Godkin

David S. Godkin, BBO #196530

Erica Abate Recht, BBO #641452

Birnbaum & Godkin, LLP

280 Summer Street

Boston, MA 02210

617-307-6100

CERTIFICATE OF SERVICE

I, David S. Godkin, hereby certify that a true and correct copy of the foregoing document was delivered to all counsel of record on August 25, 2005, by electronic service pursuant to the Court's Case Management Order No. 2.

/s/ David S. Godkin  
David S. Godkin

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**CERTIFICATE OF MICHAEL T. KIRKPATRICK IN  
SUPPORT OF REQUEST FOR ADMISSION PRO HAC VICE**

Michael T. Kirkpatrick certifies as follows:

1. I am an attorney with the Public Citizen Litigation Group, counsel for plaintiff John D. Cerqueira in the above-captioned matter. As such, I am familiar with the facts of this action and the matters set forth herein.

2. Pursuant to Local Rule 83.5.3, I submit this certificate in support of my application for admission *pro hac vice* to represent plaintiff in this case.

3. I certify that:

A. I am a member of the bars of the District of Columbia, the State of Texas, and several federal courts including the Supreme Court of the United States, the United States Courts of Appeals for the District of Columbia, First, and Fifth Circuits, and the United States District Court for the

District of Columbia. I am a member in good standing in every jurisdiction where I have been admitted to practice.

B. I have never been subject to disciplinary proceedings and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

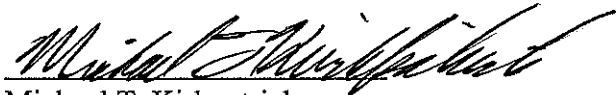
C. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

4. I respectfully request that this Court admit me to practice *pro hac vice* for the purpose of appearing for and representing plaintiff John D. Cerqueira in this action.

5. The required fee is being submitted with this Motion.

Signed under the pains and penalties of perjury.

Respectfully submitted,



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